

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

ROSETTA WATSON,	)	
	)	
Plaintiff,	)	
	)	Case No. 4:17-cv-1268-JCH
vs.	)	
	)	
CITY OF MAPLEWOOD, MISSOURI,	)	
et al.	)	
	)	
Defendants.	)	

**JOINT MOTION TO STAY DISCOVERY AND DISPOSITIVE MOTION  
DEADLINES AND TO EXTEND THE DEADLINE FOR FILING A  
STIPULATION OF DISMISSAL IN ANTICIPATION OF DISMISSAL**

Plaintiff Rosetta Watson and Defendant City of Maplewood, Missouri (collectively, the “Parties”), by and through their respective undersigned counsel, jointly submit the following Motion to Stay the Discovery and Dispositive Motion Deadlines and to Extend the Deadline for Filing a Stipulation of Dismissal set in connection with the above-captioned matter in anticipation of settlement and dismissal. In support of their Joint Motion, the Parties state as follows:

1. On Thursday July 12, 2018 and Friday July 13, 2018 the Parties attended mediation and reached a settlement of this matter in principle. Subsequently, the Parties have prepared a written settlement agreement.
2. Also on July 13, 2018, the neutral assigned as mediator for this matter, Mr. Richard Sher, filed his Alternative Dispute Resolution Compliance Report [Dkt. 83] informing the Court that the Parties reached a settlement.
3. Also on July 13, 2018, the Court filed its Order [Dkt. 84] requiring counsel to file its dismissal paperwork within sixty (60) days, by September 13, 2018.
4. The Parties have substantially completed their written settlement agreement, but

pursuant to the agreement, will not file a dismissal until the amended ordinance goes into effect.

5. Approval by the City of the settlement agreement and the first and second readings of the amended ordinance is scheduled to be on the agenda of the City Council at Defendant's next City Council meeting on August 14, 2018. A final reading is scheduled to take place at the next City Council meeting on September 11, 2018. If approved, the effective date of the amended ordinance will be fifteen (15) days later, on or about September 26, 2018.

6. Under the settlement agreement, dismissal will be filed within five (5) days of the effective date of the amended ordinance.

7. No party will be prejudiced by this request, which is made in the interests of justice and not for purposes of delay.

WHEREFORE, for the foregoing reasons, Plaintiff Rosetta Watson and Defendant City of Maplewood, Missouri jointly request the following: current discovery and dispositive motion deadlines be stayed while settlement and dismissal are finalized and executed; the deadline for filing a stipulation for dismissal be extended from September 13, 2018 to October 5, 2018; and for such other and further relief as this Court deems just and proper under the circumstances.

BRYAN CAVE LEIGHTON  
PAISNER LLP

By: /s/ Sean Cochran  
Kenneth J. Mallin (Mo. Bar. No. 33307)  
Sean Cochran (Mo. Bar No. 70001)  
211 North Broadway, Suite 3600  
St. Louis, MO 63102  
[kjmallin@bclplaw.com](mailto:kjmallin@bclplaw.com)  
[sean.cochran@bclplaw.com](mailto:sean.cochran@bclplaw.com)

ACLU OF MISSOURI FOUNDATION

Anthony E. Rothert (Mo. Bar No. 44827)  
Jessie Steffan (Mo. Bar No. 64841)  
906 Olive Street, Suite 1130  
St. Louis, MO 63101  
[arothert@aclu-mo.org](mailto:arothert@aclu-mo.org)  
[jsteffan@aclu-mo.org](mailto:jsteffan@aclu-mo.org)

ACLU WOMEN'S RIGHTS PROJECT

Sandra S. Park, #4122370NY  
Lenora M. Lapidus, #2314225NY  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
[spark@aclu.org](mailto:spark@aclu.org)  
[llapidus@aclu.org](mailto:llapidus@aclu.org)

*Counsel for Plaintiff Rosetta Watson*

LEWIS RICE LLC

By: /s/ Craig S. Biesterfeld  
Craig S. Biesterfeld (Mo. Bar No. 27233)  
600 Washington Avenue, Suite 2500  
St. Louis, MO 63101  
(314) 444-7600 telephone  
(314) 612-7726 facsimile  
[CBiesterfeld@lewisrice.com](mailto:CBiesterfeld@lewisrice.com)

HUSCH BLACKWELL LLP

By: /s/ Michael J. Tolles  
Michael J. Tolles (Mo. Bar No. 61606)  
190 Carondelet Plaza, Suite 600  
St. Louis, Missouri 63105  
(314) 480-1500 telephone  
(314) 480-1505 facsimile  
[mike.tolles@huschblackwell.com](mailto:mike.tolles@huschblackwell.com)

*Attorneys for Defendant City of Maplewood,  
Missouri*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served via the Court's electronic notification system upon all counsel of record this 3<sup>rd</sup> day of August, 2018.

/s/ Sean Cochran\_\_\_\_\_